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LIBERTY MUTUAL INSURANCE COMPANY

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

HARRY STUART KINDER,

Plaintiff,

v.

LIBERTY MUTUAL INSURANCE
COMPANY,

Defendants.

Case No. 2:23-cv-01338-JAD-BNW

[Removed from Eighth Judicial District
Court, Clark County, Case No. A-23-
871713-C]

**STIPULATION FOR EXTENSION OF
TIME FOR LIBERTY MUTUAL
INSURANCE COMPANY TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

(FIRST REQUEST)

IT IS HEREBY STIPULATED by and between Plaintiff Harry Stuart Kinder ("Plaintiff") and Defendant Liberty Mutual Insurance Company ("LMIC"), by and through their respective attorneys, as follows:

WHEREAS, on August 28, 2023 LMIC removed this action to this court;

WHEREAS, LMIC must respond to Plaintiff's complaint seven days after removal – or September 4, 2023 (Fed. R. Civ. Proc. 81(c));

WHEREAS, LMIC's deadline is extended until September 5, 2023 because September 4, 2023 is a legal holiday (Fed. R. Civ. Proc. 6(a)(1)(A)-(C));

{06968935.1}

STIPULATION FOR EXTENSION OF TIME FOR LIBERTY MUTUAL INSURANCE COMPANY TO
RESPOND TO PLAINTIFF'S COMPLAINT


1 WHEREAS, given the issues, claims, length and number of exhibits attached to Plaintiff's
2 complaint, as well as the upcoming holiday, the additional time requested is necessary for LMIC
3 to respond to Plaintiff's complaint;

4 NOW, THEREFORE, it is stipulated and agreed that LMIC's deadline to plead or
5 otherwise respond to Plaintiff's complaint is extended by three (3) days such that the new
6 deadline is September 8, 2023.

7 IT IS SO STIPULATED.

8 Dated: September 1, 2023

MAYNARD NEXSEN LLP

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11 By: NICHOLAS J. BOOS
12 Attorneys for Defendant
13 LIBERTY MUTUAL INSURANCE
14 COMPANY

15 Dated: August 30, 2023

16 *H. Stuart Kinder*
17 By: HARRY STUART KINDER
18 PLAINTIFF IN PRO PER

19 **ORDER**

20 **IT IS SO ORDERED**

21 **DATED:** 3:58 pm, September 05, 2023

22 
23

24 **BRENDA WEKSLER**
25 **UNITED STATES MAGISTRATE JUDGE**
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27
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PROOF OF SERVICE

STATE OF CALIFORNIA)
COUNTY OF SAN FRANCISCO)

I am employed in the County of San Francisco, State of California. I am over the age of 18 and am not a party to the within action. My business address is Maynard Nexsen LLP, Two Embarcadero Center, Suite 1450, San Francisco, California 94111. On the date indicated below, I served the foregoing document described as:

STIPULATION FOR EXTENSION OF TIME FOR LIBERTY MUTUAL INSURANCE COMPANY TO RESPOND TO PLAINTIFF'S COMPLAINT

on the interested parties in this action:

Harry Stuart Kinder
11720 Puerto Banus Avenue
Las Vegas, NV 89138
Tel: (415) 717-2471
Email: barrister999@yahoo.com

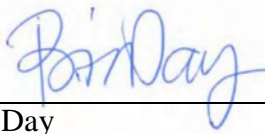
Plaintiff, Self-Represented

☐ **BY MAIL:** I caused such envelope(s) to be deposited in the mail at San Francisco, California. The envelope(s) was (were) mailed with postage fully prepaid. I am "readily familiar" with this firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on the same day in the ordinary course of business.

☒ **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused the documents to be sent from email address bday@maynardnexsen.com to the persons at the e-mail addresses listed above.

I declare that I am employed in the office of a member who has been admitted to the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 1, 2023, in San Francisco, California.



Brian Day